

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

UNITED STATES

v.

JEFFREY ALEXANDER STERLING,

Defendant.

No. 1:10cr485 (LMB)

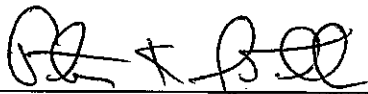
**NOTICE OF MOTION OF JAMES RISEN TO QUASH SUBPOENA  
AND/OR FOR PROTECTIVE ORDER**

James Risen hereby gives notice that he will respectfully move this Court before the Honorable Leonie M. Brinkema, in the United States District Court for the Eastern District of Virginia on July 7, 2011 at 10:00 a.m. as part of the hearing that has been previously set by the Court for consideration of Motions involving Risen in the case of *United States v. Sterling*, or at a time and place to be set by the Court, for an order quashing the subpoena directed to him and/or for a protective order.

As set forth at greater length in the supporting brief and affidavits of James Risen and Joel Kurtzberg, the subpoena should be quashed and/or a protective order entered because the testimony the Government seeks is protected by the reporter's privilege arising under the First Amendment to the United States Constitution and under federal common law, and the Government has failed to demonstrate that that privilege does not apply.

June 21, 2011

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'P. Stackhouse', written over a horizontal line.

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